

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

TOLGA SAFER YILMAZ,

Defendant.

:
:
: INDICTMENT

1: 61 CRIM 718

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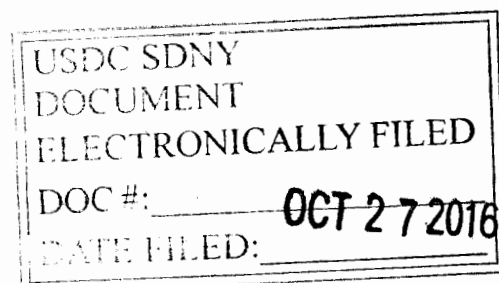
COUNT ONE

(Stalking)

The Grand Jury charges:

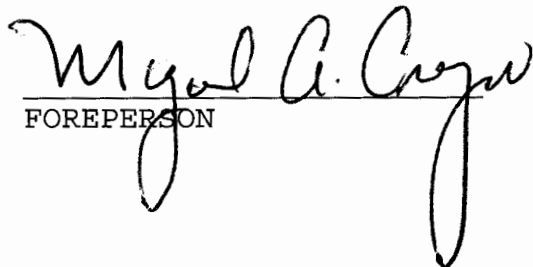
1. From at least in or about 2009 up to and including in or about at least May 2016, in the Southern District of New York and elsewhere, TOLGA YILMAZ, the defendant, with the intent to kill, injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, used the mail, any interactive computer service and electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce to engage in a course of conduct that placed that person in reasonable fear of the death of and serious bodily injury to that person and

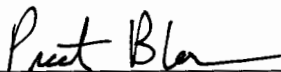
JUDGE RAMOS



caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to that person.

(Title 18, United States Code, Sections 2261A and 2.)


FOREPERSON


PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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v.

TOLGA SAFER YILMAZ,

Defendant.

INDICTMENT

16 Cr.

(18 U.S.C. §§ 2261A and 2.)

PREET BHARARA

United States Attorney

A TRUE BILL

M. G. C. C. C.
Foreperson

*10/27/16 - Filed Indictment
cc Case assigned to Ramos
J for
resms*